



Adur & Worthing Council
Portland House
44 Richmond Road
Worthing
West Sussex
BN11 1HS

Your ref
AWDM/0738/25

Our Ref
DSA000045236

Date
2nd July 2025

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: Outline application for the demolition of the existing building and the erection of a one to nine-storey block of residential apartments, a commercial unit (Class E), with associated cycle parking and car parking.

Site: 39 - 41 Brighton Road Shoreham-by-sea West Sussex BN43 6RE

Thank you for your recent correspondence. Please see our comments below regarding the above application.

This planning application has been reviewed by the Southern Water catchment hydrogeology team. The proposed development sits within the modelled Total Capture Zone for one of our public licensed groundwater abstractions meaning, during periods of low groundwater levels, our abstraction receives groundwater from the Chalk aquifer in this area. It is noted that organic contamination in the superficial deposits underlying the site was found during the Ground Investigation, related to previous and historical land use activities on the site.

We do not object to the proposal, subject to the following conditions:

- Foundations must be designed to be as shallow as practicable, with no piling or construction within the Chalk formation. If deep foundations into the Chalk are required, approval would be required from Southern Water regarding the appropriate techniques employed during construction to minimise risk of pathways/mobilisation of identified ground contamination to the underlying Chalk aquifer.
- The drainage strategy and design must not be altered from the existing proposed arrangement. Any changes will require review and approval by Southern Water.
- A Construction Environmental Management Plan (CEMP) must be prepared to ensure contractors follow best practice guidance to prevent environmental contamination, particularly related to organic contamination in the superficial deposits underlying the site related to previous and historical land use activities. Appropriate mitigation plans must be demonstrated to ensure the

risk is managed of any contamination being mobilised into the underlying Chalk aquifer during construction activities.

All relevant documents must be submitted to Southern Water for review and approval to ensure that risks to our public water supply are adequately mitigated.

Existing Sewers shown on applicant's plans not in GIS

The plan provided by the developer document *Surface Water Drainage Strategy May 2025*, reference 2.3.2 mentions a surface water sewer in Brighton Road which is not shown on our records. An assessment of the sewer is required to determine its ownership and the impact it could have to the proposed site layout. It is possible that the sewer is now deemed to be public. To get in contact to confirm the exact position of the asset please visit; https://www.southernwater.co.uk/media/ph4fk3pe/ds-location-of-rising-mains_pb.pdf

For information on required stand off distances from public sewers please refer to: <https://www.southernwater.co.uk/media/st5orjvm/stand-off-distances.pdf>

Proposed Development located in Flood plain

From the site location, it appears that the proposed development lies within an area identified as flood zone 2/3. Southern Water supports the Government's requirement to apply the sequential and exception tests to development sites located in flood zones 2 or 3. In flood events, additional surface water can inundate sewers, which may result in the overloading of the sewerage system. Southern Water will rely on the Council's consultations with the Environment Agency to ensure that any proposed development on a floodplain is appropriately assessed, and necessary mitigation measures adopted.

Condition:

In view of the risk of inundation of the proposed drainage system, Southern Water would request that the consent is subject to the following condition: The proposed drainage system shall be designed and constructed to prevent the ingress of flood water into the sewerage network.

Insufficient Information provided

Construction of the development shall not commence until details of the proposed means of foul/surface water drainage disposal have been submitted to, and approved in writing by the Local Planning Authority in consultation with Southern Water.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).

Website: [southernwater.co.uk](https://www.southernwater.co.uk) or by email at: SouthernWaterPlanning@southernwater.co.uk

Yours faithfully,

Future Growth Planning Team
[southernwater.co.uk/developing-building/planning-your-development](https://www.southernwater.co.uk/developing-building/planning-your-development)